

# **Applicant Orientation Training Module On The Personal Identity Verification Process**

## **I. Objectives**

This document is intended to serve as an orientation-training module for employees/contractors in HSPD-12 and FIPS 201. This module will include the purpose of HSPD-12, the steps involved in the PIV process, the name and phone number of the PIV Credential Applicant Representative, along with a list of duties of the representative, what the intended use of the collected information is, and your appeal rights if denied a PIV Credential. Additionally, this training module will include your role and responsibilities as an applicant within the PIV process.

## **II. Homeland Security Presidential Directive/HSPD-12**

What it is. A Common Identification Standard for Federal Employees and Contractors.

What is it's purpose? To enhance security, increase Government efficiency, reduce identity fraud, and protect personal privacy by establishing a mandatory, Government-wide standard for secure and reliable forms of identification issued by the Federal Government to its employees and contractors (including contractor employees).

The Directive can be accessed at <http://csrc.nist.gov/policies/Presidential-Directive-Hspd-12.html>

What is meant by secure and reliable forms of identification?

It is identification that (a) is issued based on sound criteria for verifying an individual employee's identity; (b) is strongly resistant to identity fraud, tampering, counterfeiting, and terrorist exploitation; (c) can be rapidly authenticated electronically; and (d) is issued only by providers whose reliability has been established by an official accreditation process.

## **III. Federal Information Processing Standards 201- Personal Identity Verification (PIV) of Federal Employees and Contractors**

Federal Information Processing Standards Publications (FIPS PUBS) are issued by the National Institute of Standards and Technology (NIST) after approval by the Secretary of Commerce pursuant to the Federal Information Security Management Act (FISMA) of 2002. FIPS 201 can be accessed at: <http://csrc.nist.gov/publications/fips/fips201/FIPS-201-022505.pdf>

**FIPS 201 is organized as follows:**

This standard is composed of two parts, PIV-I and PIV-II. The first part (PIV-I), describes the minimum requirements for a federal personal identification system that meets the control and security objectives of HSPD-12, including personal identity proofing, registration, and issuance, but does not address the interoperability of PIV Cards and systems among departments and agencies.

PIV-II addresses the technical interoperability requirements of HSPD-12. PIV-II specifies implementation and use of identity credentials on integrated circuit cards for use in a federal personal identity verification system.

**Four significant roles within the PIV process are as follows:**

- **Applicant**—The individual to whom a PIV credential needs to be issued.
- **PIV Sponsor**—The individual who substantiates the need for a PIV credential to be issued to the Applicant, and provides sponsorship to the Applicant. The PIV Sponsor requests the issuance of a PIV credential to the Applicant.
- **PIV Registrar**—The entity responsible for identity proofing of the Applicant and ensuring the successful completion of the background checks. The PIV Registrar provides the final approval for the issuance of a PIV credential to the Applicant.
- **PIV Issuer**—The entity that performs credential personalization operations and issues the identity credential to the Applicant after all identity proofing, background checks, and related approvals have been completed. The PIV Issuer is also responsible for maintaining records and controls for PIV credential stock to ensure that stock is only used to issue valid credentials.

*The roles of PIV Applicant, Sponsor, Registrar, and Issuer are mutually exclusive.*

**Sponsor Qualifications**

- Be a government official and be authorized in writing by the agency to request a PIV card
- Have a valid justification for requesting a PIV card for the Applicant
- Be in a position of responsibility for the agency
- Have already been issued a valid PIV card
- Have successfully completed PIV Sponsor training requirements

**PIV Sponsor Training Requirements Consist of:**

- Taking the required training, including the Sponsor specific training, and certifying to this

**Registrar Qualifications**

- Have confirmed the validity of the PIV Request prior to acceptance

- Be in a position of responsibility for the agency
- Have already been issued a valid PIV card
- Have successfully completed PIV Registrar training requirements
- Be a government official and be authorized in writing by the agency to act as a Registrar

#### **PIV Registrar Training Requirements Consist of:**

- Taking the required training and being familiar with the appropriate sections of the PIV Card Issuing Operations Plan and certifying to this

#### **Issuer Qualifications**

- Be a government official and be authorized in writing by the agency to issue a PIV card
- Have confirmed the validity of the PIV Request received from the Sponsor, and the approval notification received from the PIV Registrar. The PIV Issuer shall also confirm that the approval notification is consistent with the results of the background investigation
- Be in a position of responsibility for the agency
- Have already been issued a valid PIV card
- Have successfully completed PIV Issuer training requirements

#### **PIV Issuer Training Requirements Consist of:**

- Taking the required training and being familiar with the appropriate sections of the PIV Card Issuing Operations Plan and certifying to this

### **IV. How Does The PIV Process Work?**

One of the objectives of PIV 1 is making sure that whom the Department of Treasury issues a credential to is the individual they claim to be. Also, an objective is to make sure that the individual who a credential is issued to is not a known terrorist. Additionally, Treasury wants to ensure that who they issue a credential to is suitable for federal employment. The applicant must have a background investigation that is or has been favorably adjudicated. This means that the applicant who is applying for a credential for the first time or the employee/contractor who is a candidate for a reissued credential is or has been found suitable for federal employment via the background investigation process. In order to receive a credential, an applicant must willingly participate in the process. In order to receive a credential an applicant must give out the same personal information that has been required for years. This information is used for the background investigation and for the issuance of a credential.

The applicant must provide documentation as found on the I-9 form. This form can be found at <http://uscis.gov/graphics/formsfee/forms/i-9.htm>. The applicant must provide two identity source documents, which at least one is, a valid Federal or State government issued picture ID. \*It should be noted that the Department of Treasury's policy is that Federal Employee badges will not be accepted as an ID at the initial ID proofing. \* The

Registrar will perform an examination of the provided documents in part to ensure their validity and that the documents belong to the applicant who provided them. The Registrar will initiate a background investigation and perform an examination of the presented identity documents to ensure that they are neither fraudulent nor altered. Depending on individual bureau policies, at some point after this process, applicants may be issued a credential. When the Registrar certifies that all the required checks have been found favorable they will authorize the issuer to issue a credential.

The applicant will be presented to the Issuer. Prior to the issuance of the credential the Issuer will have the applicant provide a state or Federal government-issued picture identity source document. The Issuer shall validate that the picture and name on this source document matches the picture and name on the new PIV credential being personalized. Additionally, the PIV Issuer shall also validate that the appearance of the individual matches the picture being printed on the PIV credential.

### **PIV Card Reissuance**

It should be noted that current employees or contractors requiring a replacement badge, for whatever reason, **must undergo the PIV process**. Lost badges must be reported to the appropriate bureau officials within 24 hours of the employee noticing the badge is missing. Bureau officials must take appropriate steps to remove the badge from the system. The applicant must be sponsored into the PIV process by an authorized Sponsor. A new background investigation and fingerprint check will not be required if the employee has an investigation on file. If the employee has no investigation on file, the Registrar must initiate the appropriate investigation.

### **Other Circumstances Requiring PIV Card Reissuance**

A new PIV Credential shall be issued if a PIV Credential holder changes names. The PIV Credential must be updated within 30 days of the name change. The PIV Credential holder shall provide the legal document(s) (e.g. marriage certificate or court order) which authorized the name change. A PIV Credential holder may be reissued a new PIV Credential under other circumstances that require a change to the PIV Credential holder's existing Credential. As an example, a change in the PIV Credential holder's security clearance or status as a first responder would require the issuance of a new PIV Credential.

## **V. Privacy**

HSPD-12 stated in part: "This [directive](#) shall be implemented in a manner consistent with the Constitution and applicable laws, including the [Privacy Act \(5 U.S.C. 552a\)](#) and other statutes protecting the rights of Americans."

Everyone who participates in the PIV System has a responsibility to contribute to the systems privacy, security, and protection. By Title 18 of the U.S. Code, it is a Federal offense to counterfeit, alter, or misuse the PIV card and system.

## **Privacy Notice**

*On or about your first day of employment you will be asked to give some personal information to personnel acting in the role of Sponsor. They will record the information that you give them on a form, the PIV Request Form.*

5 U.S.C. § 301 and 31 U.S.C. § 321 provide the authority for collecting the requested information. Executive Order 9397 (November 22, 1943) provides the authority for requesting your social security number. The purpose for collecting the requested information is to enable the Bureaus and Offices within the Department of The Treasury to produce and distribute identification cards to allow entry into their facilities.

The information collected by this form may be disclosed in accordance with The Department of The Treasury's published routine uses and as otherwise permitted under the Privacy Act of 1974 (5 U.S.C. § 552a), including disclosure: to the Office of Personnel Management, the Merit Systems Protection Board, the equal Employment Opportunity Commission, and the Federal Labor relations Board upon an authorized request; to agencies, contractors, and others to administer personnel and payroll systems, for debt collection and for employment or security investigations; to law enforcement agency if the Department of The Treasury becomes aware of a possible violation of a law or regulation; to a Congressional office in response to requests made on your behalf; to the Department of Justice, courts, and counsel during litigation; to unions if needed to perform their authorized duties; to other agencies under approved computer matches; and as otherwise authorized by law or regulations.

This form is in compliance with the Privacy Act of 1974. This form is needed to meet the policy requirements of The Department of The Treasury. The information on this form will be used to satisfy the requirements of HSPD 12, FIPS 201-PIV (Personal Identity Verification of Federal Employees and Contractors.)

Furnishing the information on this form, including your social security number, is voluntary, but failure to do so may result in non-issuance of an identification card, thereby preventing you from accessing The Department of The Treasury's facilities.

**Public Debt's PIV Card Applicant Representative is the Disclosure Officer, Denise Hofman. Her extension is (304) 480-8402**

### **Responsibility**

- Represent the interests of current or prospective Federal employees and contractors who are the Applicants for PIV Cards.

### **Roles**

- Represent the privacy concerns of applicants, assist an applicant who is denied a PIV Card because of missing or incorrect information in an Identity Source document, or act as a surrogate for an applicant that is not available for performing required actions.

## **VI. Appeal Rights for Denied Credential**

### **Employees**

Public Debt will follow OPM appeals rights found in either 5 CFR 731 or 5 CFR 752 as applicable, when the background investigation is not favorably adjudicated for applicants.

In the instance that it is deemed that an applicant is not eligible for receipt of a credential due to the results of the identity vetting process or upon the receipt of the finger print check, initially, the Registrar will be the deciding official. In the event that an applicant is deemed unsuitable after the full background investigation has been adjudicated, the deciding official will be the Director of HRD or their authorized delegate.

In the event that an applicant is found to be ineligible for a credential during the identity vetting process or upon receipt of the fingerprint check, the following will occur: The Applicant will be notified in writing by the Registrar of the reason(s) for the unfavorable decision. For appeals purposes, a copy of this notification will be provided to LERB. For appeals purposes, the Applicant may request a review. The request for appeal must be in writing and hand carried, faxed or, if mailed, postmarked within 10 calendar days of receipt of the unfavorable decision. The request shall be addressed to LERB. LERB will conduct a review and determine if the decision should be sustained, modified, or reversed, and notify the Registrar and the employee of the decision.

During this process, HRD will make the decision of whether any subsequent action will be taken if it is a suitability issue. The Security Branch Manager will decide on subsequent action if the Applicant's conduct is deemed to be a security violation.

### **Contractors**

The Registrar shall use 5 CFR 731 or the "Adjudicative Guidelines for Determining Eligibility for Access to Classified Information" dated March 24, 1997 when making adjudicative determinations on contractors. Public Debt shall abide by the following appeal procedures when an unfavorable adjudication decision results in a contractor being found ineligible for a credential:

The Registrar who adjudicated the investigation shall provide the applicant the reason(s) for the unfavorable decision in writing. A copy of the decision shall not be provided to the company. The applicant may request a review. The request must be in writing and faxed or, if mailed, postmarked within 10 calendar days of receipt of the unfavorable decision. The request shall be addressed to the Security Branch. The adjudicating officer, the Branch Manager of the Security Branch, will review the request and determine if the adjudication decision should be sustained, modified, or reversed, and notify the applicant of the decision. The applicant shall also be informed that the decision is final. If the final determination is unfavorable, the Contracting Officers Technical Representative

(COTR) will be informed by letter that the applicant is ineligible for a PIV Credential. Due to privacy requirements, no other information about the decision will be provided to the COTR or applicant's company. If the adjudicating office does not receive a request from the applicant to review an unfavorable decision, the decision shall become final 15 calendar days after issuance.

## **VII. Applicant Responsibilities**

- You shall cooperate fully in the PIV process
- You may not attempt to copy, modify, forge, or obtain data from any PIV Credential
- You may not assist others in gaining unauthorized access to Federal facilities or information
- You must report the loss or theft of an issued PIV Credential within 24 hours of noting its disappearance
- You shall protect your PIV card

As an applicant you are required to read the information contained in this training module in order to be eligible to receive government identification, now known as a PIV card.

On your first day of orientation you will certify that you have received training and notice on each of the subjects.